

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

JAMES A. WOLFE

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Criminal No.: 1:18-CR-00170 (KBJ)

UNOPPOSED MOTION FOR RETURN OF PASSPORT

Defendant James A. Wolfe has completed the term of incarceration ordered by this Court on December 20, 2018 [ECF No. 59], and now is serving his four months of Supervised Release. While he was incarcerated, Mr. Wolfe's driver's license was apparently misplaced by the Bureau of Prisons and was not returned to him during his discharge. In order to replace his driver's license, Mr. Wolfe needs his passport, which we understand is currently being held by the Office of the Clerk for the United States District Court for the District of Columbia and requires a motion to be released.

We respectfully request that the Court order the return of Mr. Wolfe's passport. Mr. Wolfe is aware that any travel during his Supervised Release is subject to the prior approval of the Probation Office. We have consulted with government counsel about this request, and the government has authorized us to represent that it has no objection to the return of Mr. Wolfe's passport. We do not request a hearing on this unopposed motion.

Dated: May 1, 2019

Respectfully submitted,

/s/ Preston Burton

Preston Burton (D.C. Bar No. 426378)

Benjamin B. Klubes (D.C. Bar No. 428852)

Lauren R. Randell (D.C. Bar No. 503129)

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Counsel for Defendant James Wolfe

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of May, 2019, I caused a true and correct copy of the foregoing Unopposed Motion for Return of Passport to be filed with the Clerk of Court using the CM/ECF filing system.

/s/ *Lauren Randell*
Lauren R. Randell (D.C. Bar No. 503129)

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ORDER

The Court having considered Defendant James A. Wolfe's Unopposed Motion for Return of Passport, it is hereby ORDERED that Defendant's unopposed motion is hereby GRANTED, and the Office of the Clerk for the United States District Court for the District of Columbia is hereby ORDERED to return Mr. Wolfe's passport to him forthwith.

Dated this _____ day of _____, 2019.

The Honorable Ketanji Brown Jackson
United States District Court

Copies to: Counsel of Record
 Office of the Clerk, U.S. District Court
 Probation Office, U.S. District Court